

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND LITIGATION

This document relates to:

18 Civ. 5053  
18 Civ. 5374  
18 Civ. 8655  
18 Civ. 9797  
18 Civ. 10100

MASTER DOCKET

Case No.: 18-MD-02865 (LAK)

**STIPULATION AND PROPOSED**  
**ORDER**

WHEREAS, Third-Party Plaintiffs DW Construction, Inc. Retirement Plan, Kamco Investments, Inc. Pension Plan, Kamco LP Profit Sharing Pension Plan, Linden Associates Defined Benefit Plan, Moira Associates 401(k) LLC Plan, Riverside Associates Defined Benefit Plan, American Investment Group of New York, L.P. Pension Plan, Del Mar Asset Management Savings and Retirement Plan, Federated Logistics LLC 401(k) Plan, Newsong Fellowship Church 401(k) Plan, The Goldstein Law Group PC 401(k) Profit Sharing Plan, and Sheldon Goldstein (collectively, “Third-Party Plaintiffs”) have filed Third-Party Complaints against ED&F Man Capital Markets, Ltd. (“ED&F”) in the above-listed actions;

WHEREAS, ED&F filed an Answer and Counterclaim in each of the above-listed actions on March 2, 2020;

WHEREAS, three groups of Third-Party Plaintiffs each filed a Motion to Dismiss ED&F’s Counterclaims (the “Motions”) on March 30, 2020;

WHEREAS, the deadline for ED&F to respond to each of the Motions is April 13, 2020, and the deadline for the Third-Party Plaintiffs to submit reply memoranda is April 20, 2020;

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties through their undersigned attorneys, that ED&F may respond to the Motions in a single omnibus memorandum, not to exceed 50 pages in length, on or before April 30, 2020. The Third-Party Plaintiffs may file reply memoranda of law on or before May 15, 2020.

Dated: April 3, 2020  
New York, NY

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K&L GATES LLP

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**IT IS SO ORDERED.**

/s/ Lewis A. Kaplan      April 13, 2020

**HON. LEWIS A. KAPLAN, U.S.D.J.**